

JONATHAN O. PENA, ESQ.  
CA Bar ID No. 278044  
Peña & Bromberg, PLC  
2440 Tulare St., Suite 320  
Fresno, CA 93721  
Telephone: 559-412-5390  
Fax: 866-282-6709  
[info@jonathanpena.com](mailto:info@jonathanpena.com)  
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

vs.  
Kilolo Kijakazi, Acting  
Commissioner of Social Security,  
Defendant.

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from August 29, 2022 to September 28, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for Plaintiff's request. In the months of May through July 21, 2022, Counsel has received an influx of Social Security Certified Administrative Records (CAR).

1 A review of the records received shows Counsel has received at least 50 CARs, the  
2 majority of which were filed in June 2022.

3           Additionally, for the weeks of August 22, 2022 and August 29, 2022,  
4   Counsel currently has 15 merit briefs, and several letter briefs and reply briefs.  
5   Additional time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to  
7 the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

<sup>10</sup> Dated: August 9, 2022 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena  
JONATHAN OMAR PENA  
Attorneys for Plaintiff

Dated: August 9, 2022

PHILLIP A. TALBERT  
United States Attorney  
PETER K. THOMPSON  
Acting Regional Chief Counsel, Region IX  
Social Security Administration

By: \*s/ Andrea Banks  
Andrea Banks  
Special Assistant United States Attorney  
Attorneys for Defendant  
(\*As authorized by email on August 9, 2022)

## ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: August 9, 2022

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE